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SO ORDERED:


Hon. Stewart D. Aaron
United States Magistrate Judge

August 5, 2025

Dated: August 6, 2025

Re: *In re UiPath, Inc. Derivative Litigation*, No. 1:24-CV-05157-JPC-SDA

Hon. Stewart D. Aaron
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007

Dear Judge Aaron,

We represent Nominal Defendant UiPath, Inc. (“UiPath”) and the Individual Defendants¹ (together, “Defendants”) in the above-referenced action (the “Derivative Action”). We submit this Letter-Motion jointly on behalf of all Defendants and Plaintiffs Clifton Murie and Samhita Gera (together, the “Parties”). As set forth below, all Parties respectfully request that, in the interest of judicial economy, the Court extend the stay of all deadlines that is currently in place pending the outcome of the forthcoming motion to dismiss in the related securities case, *In re UiPath, Inc. Securities Litigation*, 1:24-cv-4702-JPC-SDA (the “Securities Action”), also pending before this Court.

On July 23, 2025, the Court granted the motion to dismiss filed by UiPath, Mr. Dines, and Mr. Enslin in the Securities Action. See Securities Action ECF No. 38. Pursuant to Section 2 of the Parties’ stipulation (ECF No. 13 (the “Stipulation and Stay”)), the motion to dismiss decision effectuated a “Termination Date,” which requires the Parties to meet and confer and submit a proposed schedule to the Court for the next steps in the Derivative Action.

Plaintiffs in the Securities Action have recently indicated that they intend to amend their complaint further. UiPath, Mr. Dines, and Mr. Enslin expect to file a motion to dismiss the further amended complaint. And on July 31, 2025, the Court so-ordered the parties’ stipulation as to deadlines for filing the second amended complaint and briefing defendants’ motion to dismiss it. See Securities Action ECF No. 40.

The Parties in the Derivative Action agree that the outcome of the forthcoming motion to dismiss the further amended complaint in Securities Action may inform the extent to which the pending consolidated Derivative Action proceeds and therefore whether Defendants will need to brief (and the Court will need to decide) a motion to dismiss the Derivative Action. For that reason and in the interest of judicial economy and avoiding unnecessary motion practice, the Parties wish for this Derivative Action to remain stayed under the terms of the Stipulation and Stay, provided that the provision of Section 2(a) that refers to the “resolution of the Motion to Dismiss in the Federal Securities Action” shall refer to the resolution of the forthcoming motion to dismiss the second amended complaint. The Parties respectfully request that the Court direct the continuation of the terms and effects of the Stipulation and Stay by so-ordering this letter.²

¹ The Individual Defendants are Daniel Dines, Robert Enlin, Ashim Gupta, Philippe Botteri, Michael Gordon, Daniel Springer, Laela Sturdy, Karenann Terrell, Richard P. Wong, and June Yang.

² The Parties previously requested an adjournment of the deadlines through the Stipulation and Stay, but this is Parties’ first request since plaintiffs in the Securities Action provided notice of their intent to further amend.

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We are available at the Court's convenience should Your Honor have any questions or otherwise wish to hear from the Parties.

Respectfully yours,

/s/ Edmund Polubinski

Edmund Polubinski

cc: All counsel of record via ECF

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